

REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested.

Claims 1-13 are pending. Claim 13 has been added to secure an appropriate scope of protection to which applicants are believed entitled.

The rejection of claims 1-12 under 35 U.S.C. 103(a) as being unpatentable over Arora et al. (U.S. Patent 5,911,145) in view of Courter et al. ("Mastering Microsoft Office 2000 Professional Edition") is hereby traversed. The asserted combination of references fails to render obvious the present claimed subject matter for at least five reasons.

First, Arora fails to disclose screens for receiving attribute category information, attribute group information, attribute information, and attribute to attribute group association information. In FIG. 4, Arora depicts a display of a site hierarchy of multiple web pages. "[T]he user has added page icons 452-474 by selecting . . . on New Page button 314 for each new page icon added. Each new page icon represents a new page added to the site hierarchy." Arora at column 6, lines 48-51. Thus, "Welcome" at reference number 452, "Services" at reference number 458, "Boots" at reference number 472, and "Skis" and "Poles" at reference numbers 470, 474 of FIG. 4 each represent individual web pages and not attribute category information, attribute group information, attribute information, and attribute to attribute group association information, respectively. For at least this reason, the rejection of claim 1 should be withdrawn.

Second, Arora fails to disclose creating a web page using the attribute category, attribute group, attribute, and attribute to attribute group association information. As

described supra, Arora fails to disclose attribute category information, attribute group information, attribute information, and attribute to attribute group association information and Courter fails to cure the noted deficiency. Therefore, Arora cannot create a web page using the claimed information. For at least this reason, the rejection of claim 1 should be withdrawn.

Third, the Examiner admits that Arora fails to explicitly describe first, second, third, and fourth screens according to the present claimed subject matter. Courter fails to cure the admitted Arora deficiency as Courter at Figure 31.11 depicts common form controls for use in creating a form for receiving or displaying information in a table. Specifically, Figure 31.11 of Courter depicts form controls and not a screen used to create data objects or for receiving information related to a web page. The Examiner's assertion regarding repeated use of the screen depicted in Figure 31.11 is purely speculative and finds no basis in the reference. Further, Figure 29.8 of Courter fails to disclose attribute category, attribute group, attribute, and attribute to attribute group association information. Figure 29.8 depicts, at most, a number of tables and relationships between the tables. The fact that one table is called a "Categories" table is not dispositive. The identified tables, i.e., "Categories," "Products," "Order Details," and "Orders," are unrelated to attribute-related information of the present claimed subject matter. For at least this reason, the rejection of claim 1 should be withdrawn.

Fourth, the test for setting forth a prima facie case of obviousness has not been satisfied. The statement that "databases represent a quantum leap in data management capability" fails to teach or suggest any reason why a person of ordinary skill in the art

at the time of the present invention would have been motivated to combine the web page editor of Arora and Courter's relational database.

A statement that combinations of the prior art to meet the claimed invention would have been well within the ordinary skill of the art is not sufficient to establish a prima facie case of obviousness without some objective reason to combine the teachings of the references. See MPEP 2143.01 quoting Ex parte Levengood, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993). The Office Action merely states that databases represent a quantum leap in data management capability, and does not state any desirability for making the modification. In other words, the Office Action failed to supply any objective reasons to combine the applied references.

In accordance with MPEP §2143.01 and Al-Site Corp. v. VSI Int'l Inc., 174 F.3d 1308, 50 USPQ2d 1161 (Fed. Cir. 1999), the Examiner is requested to identify a teaching, suggestion, or motivation in either reference or to provide an affidavit of facts within the personal knowledge of the Examiner per MPEP §2144.03 providing a motivation or suggestion to one of ordinary skill in the art to make the argued combination. The Examiner has neither identified any teaching in Arora or Courter motivating or suggesting the asserted combination to a person of ordinary skill in the art nor provided an affidavit because there is no teaching to be found.

"When an obviousness determination is based on multiple prior art references, there must be a showing of some 'teaching, suggestion, or reason' to combine the references." Winner International Royalty Corp. v. Wang, 53 USPQ2d 1580, 1586 (Fed. Cir. 2000). The Examiner has failed to make such a showing supporting the applied

combination of references and therefore the applied combination of references is improper.

Fifth, even assuming *arguendo* that the references were combinable, based on the first and second points above the combination still fails to render obvious the present claimed subject matter. Thus, even if the tables of Courter were combined with the Arora web page editor, the combination still fails to disclose presenting first, second, third, and fourth screens for receiving attribute category information, attribute group information, attribute information, and attribute to attribute group association information, respectively, and creating a web page using the attribute category information, attribute group information, attribute information, and attribute to attribute group association information. For at least this reason, the rejection of claim 1 should be withdrawn.

Based on any of the foregoing reasons, claim 1 is patentably distinguishable over Arora in combination with Courter and the rejection of claim 1 should be withdrawn.

Claims 2-7 depend from claim 1, include further important limitations, and are patentable over Arora in view of Courter for at least the reasons advanced above with respect to claim 1. The rejection of claims 2-7 should be withdrawn.

With specific reference to claim 2, reference number 2250 of Figure 22 of Arora describes a grid spacing size for the initial page layout and not a column specification as claimed in claim 2. For this reason and the reasons advanced above, the rejection of claim 2 should be withdrawn.

With specific reference to claim 3, reference numbers 2264 and 2274 of Figure 22 of Arora describe a grid spacing size for draw objects on an initial page layout and a

horizontal splitter, respectively, and not a column specification or column orientation as claimed in claim 3. For this reason and the reasons advanced above, the rejection of claim 3 should be withdrawn.

With specific reference to claims 4 and 5, Courter's "Description" is not a column number and a one to many table relationship is not a table orientation. Similarly, Courter fails to disclose the attribute group information including category ID, group ID, group order, and group name information as claimed in claim 5. Selecting various table elements from Courter because of similar sounding titles fails to render obvious the claimed subject matter. If the Examiner persists, the Examiner is requested to specifically identify the applicability of each of the selected table elements to the present claimed subject matter. For this reason and the reasons advanced above, the rejection of claims 4 and 5 should be withdrawn.

For reasons similar to those advanced above with respect to claims 4 and 5, claims 6 and 7 are not rendered obvious in view of the combination of Arora in view of Courter and the rejection of claims 6 and 7 should be withdrawn.

Claim 8 is patentable over the applied combination of Arora in view of Courter for reasons similar to those advanced above with respect to claim 1. The rejection of claim 8 should be withdrawn.

Claims 9-12 depend from claim 8 and are patentable over Arora in view of Courter for at least the reasons advanced above with respect to claim 8. The rejection of claims 9-12 should be withdrawn.

Claims 9-12 are additionally patentably distinguishable over Arora in view of Courter for at least reasons similar to those advanced above with respect to claims 2-7, respectively.

New claim 13 recites a computer-readable medium storing instructions which, when executed by a processor, cause the processor to perform the method of claim 1 and is patentably distinguishable over Arora in view of Courter for at least the reasons advanced above with respect to claim 1 from which it depends.

All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 08-2025 and please credit any excess fees to such deposit account.

Respectfully submitted,

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Date: October 5, 2005